

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SHEILA CLARKE, as Personal Representative
for The Estate of JANIKA NICOLE EDMOND,
deceased,

Plaintiff,

v

MICHIGAN DEPARTMENT OF
CORRECTIONS, WARDEN ANTHONY
STEWART, individually and in his official
capacity; DEPUTY WARDEN DAVID
JOHNSON, individually and in his official
capacity; DEPUTY WARDEN OSTERHOUT,
individually and in his official capacity; CO
DIANNA CALLAHAN, individually and in her
official capacity; A/RUM KORY MOORE,
individually and in his official capacity; CO
R'KIA TAYLOR, individually and in his official
capacity; SGT. KRISTA SURBIC, individually
and in her official capacity; SGT. LOREN
HAILES, individually and in her official
capacity; CO HEATHER WASHINGTON,
individually and in her official capacity; CO
JOHANNA BARTEL, individually and in her
official capacity; CO ALEXIA JOHNSON,
individually and in her official capacity; CO
LASHAWNA DONALD, individually and in her
official capacity; CO TRACY MAUPINS,
individually and in her official capacity; RN
MARCIA PORTER, individually and in her
official capacity, jointly and severally,

Defendants.

No. 2:17-cv-10528

HON. ROBERT H. CLELAND

MAG. DAVID R. GRAND

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Washington, Bartel, A. Johnson, Porter,
Donald and Maupins
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STIPULATED PROTECTIVE ORDER

Now come Plaintiff, and the Michigan Department of Corrections (“MDOC”) by and through their counsel, and in order to address Plaintiff’s pending Motion to Compel Production of Addresses (R. 32, hereafter “the Motion”), whereby Plaintiff seeks for purposes of service of process the addresses for three of the Defendants who were prior employees of MDOC, and state as follows:

1) The Motion seeks addresses for Defendants Moore, Surbic and Porter. Defendants Surbic and Porter are now going to be represented by undersigned counsel, and are the subject of another stipulation being submitted to the Court, and therefore, they are no longer the subject of the Motion. As to the other Defendant who has not yet been served (Moore), MDOC shall provide the last known address for this prior employee, subject to the restrictions set forth herein, and to be used solely for purposes of service of process.

2) Wherefore, these parties hereby stipulate and agree that: MDOC will provide the last known address as to named Defendant Kory Moore, to Plaintiff's counsel for the sole purpose of effectuating service of process and only to be disclosed to the process server for purposes of service of process. This address shall not be disclosed to any other individual/entity, including but not limited to Plaintiff. The address shall not be publicly disclosed, and shall not be included in any filing the Court, including but not limited to any proof of service (which shall only state that this defendant was served at the address(es) subject to this Order).

Defendant MDOC submits that there are sound policy/safety considerations for not making the addresses of current/former

corrections officials public, and enter into this Stipulation as a means of balancing Plaintiff's need for such address to effectuate service, with policy/safety considerations regarding the prior officers, and submit that this Stipulated Protective Order is a fair compromise which takes into account both perspectives and considerations.

Wherefore, these parties respectfully request that this Honorable Court enter this Order.

IT IS SO STIPULATED.

s/Cary S. McGehee (w/consent)
Cary S. McGehee (P42318)
Co-Counsel for Plaintiff

June 7, 2017
Date

s/Rock Wood
Rock Wood (P41181)
Attorneys for Defendants MDOC, Stewart,
D. Johnson, Osterhout, Taylor, Surbic,
Hailes, Washington, Bartel, A. Johnson,
Porter, Donald and Maupins

June 7, 2017
Date

IT IS SO ORDERED.

Date: June 13, 2017

s/Robert H. Cleland
Robert H. Cleland
U.S. District Court Judge